

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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IN RE:

22-md-3028 (PAE)

ONE APUS CONTAINER SHIP INCIDENT ON  
NOVEMBER 30, 2020

*This Document Relates to "All Actions"*

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**MOTION TO WITHDRAW AS COUNSEL OF RECORD  
WITH CERTIFICATE OF SERVICE**

PLEASE TAKE NOTICE that pursuant to Local Rule 1.4, Randolph Donatelli, an attorney with the firm of Lyons & Flood, PLLC, counsel for defendant/third-party defendant Ocean Network Express Pte. Ltd. ("ONE"), respectfully requests that the Court order his withdrawal as counsel of record for ONE. Mr. Donatelli seeks to withdraw because he will soon be leaving Lyons & Flood PLLC to join Thomas Miller (Americas), Inc. in Jersey City, NJ.

Mr. Donatelli's withdrawal will have no impact on the proceedings before this court because attorneys Jon Werner and Kirk Lyons of Lyons & Flood PLLC have appeared in this action to act for ONE. Mr. Donatelli is not retaining or charging a lien.

As required by Local Rule 1.4, this motion is being served on all parties (via ECF) and on ONE.

Dated: December 19, 2024

By:



Randolph H. Donatelli  
LYONS & FLOOD, PLLC  
The Towers, Suite 206  
111 Great Neck Road  
Great Neck, NY 11021  
Tel: (212) 594-2400  
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GRANTED.

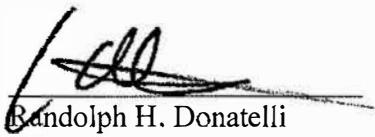
SO ORDERED:

Paul A. Engelmayer  
Hon. Paul A. Engelmayer

December 20, 2024  
New York, New York

**CERTIFICATE OF SERVICE**

Randolph H. Donatelli, an attorney duly admitted to practice before this Honorable Court, affirms on this 19th day of December 2024, that he served a true copy of the foregoing on OCEAN NETWORK EXPRESS PTE. LTD.

  
Randolph H. Donatelli